

## Barnet Local Plan Examination in Public Transport for London Commercial Development Written Statement on: Matter 2: Spatial Strategy and Strategic Policies

2) *Does the Plan as submitted appropriately identify “strategic policies” or are the Council’s proposed modifications necessary for soundness?*

In order for the Plan to be sound, the modifications set out in the signed [Statement of Common Ground](#) (Examination doc ref: EB\_SoCG\_14) and the Council’s proposed modifications (subject to our responses letter which we sent to the Council on 18 August 2022 – Enclosure 1) should be made. These changes will ensure that the plan is ‘sound’ and that policies and supporting text are clearly written and unambiguous.

6) *Is the approach of strategic policies relating to the spatial distribution of development [including redevelopment of car parks], positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan? In those respects:*

...

b) *Is such an approach in seeking to guide and deliver development to the aforementioned areas, appropriate and justified?*

Redevelopment of Car Parks (Policy GSS12) is particularly appropriate and justified in terms of accordance with the NPPF (paragraph 120d) which requires policies and decisions to “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)”. This also accords with adopted policies of the London Plan (eg. H1 and SD7) and the Mayor’s Transport Strategy (MTS). We address Policy GSS12 in more detail in respect of Matter 6, question 2.

10) *Taking account of the evidence accompanying the Plan, the levels of housing growth sought in the Edgware Growth Area appear particularly ambitious when considering the site opportunities identified (Sites 27 and 28) on Map 3C and other relevant policy considerations relating to matters such as tall buildings, flood risk and heritage assets:*

a) *Is Policy GSS05, justified, effective and consistent with national policy in those respects?*

b) *If not, would the Council’s proposed modifications be sufficient to achieve soundness or would further changes to the policy be required?”*

Savills has prepared a statement on these questions on behalf of the Ballymore Group and TfL CD / TTLP who are in a Joint Venture (JV) to bring forward the Broadwalk Shopping Centre and TfL landholdings around Edgware Station for redevelopment. We support the Savills Statement and do not repeat it here.

11) *The Plan approach to Colindale Growth Area identifies site opportunities on Map 3D (Sites 9, 10, 11, 12 and 13) and other relevant policy considerations, in those regards:*

a) *Is Policy GSS06, justified, effective and consistent with national policy, including in terms of the development expected to be delivered at Colindale Underground station, the new local centre at Colindale Gardens, the Grahame Park Estate, the Public Health England site and Middlesex University's Platt Hall?*

Yes.

TfL CD has agreed modifications with the Council including confirmation that the development expected at Colindale Underground station will include "new ... ticket hall building with step-free access to the platforms and sufficient gate capacity" (EXAM 4: Council's Proposed Modifications, MM88). This change ensures that the policy is clearly written and unambiguous.

Planning permission has been granted for the development at Colindale underground station. The 10 March 2020 planning permission is a 'hybrid', part full, part outline permission (LBB ref: 19/0859/OUT) for:

*"Hybrid planning application for comprehensive redevelopment of the site comprising full planning permission involving demolition of existing buildings to provide a replacement railway station ticket hall building (702 sq.m) with step free access (sui Generis) and including a retail store (Class A1) unit. Outline planning consent for the erection of a mixed use development ranging from 6 to 29 storeys in height comprising of up to 860 sq.m of flexible A1/A2/A3/A4/A5 and B1/D1/D2 uses and up to 313 residential units (Class C3) together with provision of ancillary refuse, cycling and disabled parking spaces and associated works. (SUBJECT TO LEGAL AGREEMENT DATED 6 MARCH 2020)"*

In terms of development expected to be delivered at Colindale Underground station, we therefore consider Policy GSS06 (as proposed to be modified) to be justified, effective and consistent with national policy.

13) *Policy GSS09 relates to Existing and Major Transport Infrastructure, in that regard:*

a) *Are the Council's proposed modifications necessary for soundness?*

Yes, modifications with regard to the redevelopment of car parks have been agreed with TfL CD via the SoCG (ref: EB\_SoCG\_14) and the provision of only essential replacement car parking accords with national, London Plan and MTS policies to reduce the use of private vehicles and encourage the use of public transport and active travel. We address the re-development of publicly accessible surface level car parks in more detail under Matter 6, question 2.